

# *The Atlantic Foundation*

September 23, 2024

**BY ECF**

The Honorable Katharine H. Parker  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Plaintiff's Unopposed Request for Extension to File – Amended Complaint  
*Thompson v. Lemon, et al.*, No. 23-cv-2102 (JPO) (KHP)

Dear Judge Parker:

As *pro bono* counsel, I write on behalf of Plaintiff Kwaine Thompson (“Plaintiff”), pursuant to Your Honor’s Individual Rules of Practice, to request an extension of time to file Plaintiff’s amended complaint, which is currently due on September 28, 2024. *See* ECF No. 16.

Plaintiff respectfully requests an additional thirty (30) days, which would make the amended complaint due by October 28, 2024. This is Plaintiff’s first request for extension. In part, this request is necessary because Mr. Thompson’s communication capabilities are limited since he remains incarcerated. For example, the majority of our communication is done by first-class mail, which imaginably presents its own challenges.

As for the defendants’ position, counsel stated the following: “The Office of Corporation Counsel takes no position, particularly as we do not represent any defendants in this case.”

Thank you very much. I sincerely appreciate the Court’s attention to this matter.

Respectfully,

/s/ Sami Elamad  
Sami Elamad

cc: Counsel of record (via ECF)